

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Docket No. C2001-1

Complaint on Sunday
and Holiday Collections

REPLY BRIEF OF DAVID B. POPKIN
July 23, 2002

Respectfully submitted,

July 23, 2002

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

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1. Briefs in this Docket were filed on July 9, 2002.
 2. I would like to comment on the Initial Brief filed by the United States Postal Service.
 3. A number of the comments made by the USPS appear to be totally irrelevant to the issues raised in the Complaint that was filed.
 4. Whether or not Mr. Carlson filed a complaint about the lack of retail or delivery service on holidays is irrelevant.¹ The Postal Operations Manual and Domestic Mail Manual do not show these services on holidays but they do show outgoing mail service. That is the service that has been cut back.
 5. Whether or not other parties intervened in this Docket is irrelevant.² Perhaps other parties felt that their interests could be well represented by Mr. Carlson, OCA, and myself and made a cost-based decision not to participate. Likewise, whether I intervened as a result of information appearing on the PRC website or as a result of the Federal Register notice is similarly irrelevant.
 6. The attachment to the Postal Service's Brief³ appears to make an effort to resolve one of the main concerns of the Complaint, namely, collections that are reduced or eliminated on the eves of holidays with or without ample notice to the public. The

¹ USPS Brief at 3

² USPS Brief at 21

³ Donahoe letter dated June 26, 2002.

second bullet item now states that District-wide collection adjustments will not be permitted. Perhaps, the most effective enforcement tool to ensure compliance with this policy is that it states that EXFC testing will not be suspended.

7. The second point is that it provides for adjustments only in a localized area and only if collections are impractical. The example given is the New Year's Eve celebration in Times Square in New York City. For such localized incidents, the number of collection boxes involved should be relatively small and it should be possible to provide notices on all of the affected boxes. Furthermore, the times that collection activities in this example would be affected would probably be after the last collection time on December 31st at most of the boxes and certainly would not affect the collections required on January 2nd. Perhaps the only collection box that would be affected is the one in front of the Times Square Station post office.

8. The first bullet item in the Donahoe letter raises an interesting concern. The last sentence seems to state that the only reasons that mail may be collected on a holiday is either to avoid box overflows or advance processing for the next processing day. This sentence now seems to preclude any collections that are made on the holiday if the purpose of the collection is to allow for the dispatch of mail on the holiday.⁴

9. This item seems to also eliminate all collections made on widely observed holidays.

10. The policy of not indicating collection times on boxes unless there are collections and processing on all ten holidays has reduced the amount of mail processed on holidays.⁵ If the Postal Service will make a decision as to what action will be taken on the various holidays and then post that time on the collection box, the volume of mail processed on holidays and the service to the public will be improved. The labels could be marked as had been done in Mobile, Alabama, prior to the removal of the holiday-specific labels.

⁴ I understand the avoidance of box overflows means that a box, which is full on a non-widely-observed holiday, will be collected and the mail brought inside the plant for processing on the next processing day. Similarly, I understand that the collection to advance processing for the next processing day means that the mail will be collected so that it will be available at the processing plant for early processing on the day after the holiday. That objective could probably be better served by making an early morning collection on the day after the holiday.

⁵ USPS Brief at 12

11. While flexibility may be convenient to the operation of the Postal Service, the mailing public needs a predictable level of service.

12. The Commission should arrive at the conclusion that the Postal Service did not seek an advisory opinion when making the changes to its holiday collections.

13. The Commission should issue a report stating that the Postal Service should arrive at a permanent solution to its collection policy on and around holidays and modify the Exhibits in the Domestic Mail Manual and Postal Operations Manual to reflect that policy. Furthermore, the labels on the collection boxes should be printed so as to fully indicate the level of service provided at that box on and around the various holidays.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

July 23, 2002

David B. Popkin